

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000) Docket No. R2000-1

NOTICE OF INTERVENTION OF AMERICAN BUSINESS PRESS

Pursuant to Section 20 of the Commission's Rules of Practice and Order No. 1279 issued January 14, 2000, American Business Press (ABP) hereby notices its intervention as a full participant in the above-captioned docket.

ABP is an association of the nation's leading publishers of business, professional and medical periodicals, which are mailed almost exclusively at the regular Periodicals rates. ABP members publish more than 1,000 periodicals and pay roughly \$200,000,000 in Periodicals postage alone. They also use substantial amounts of First-Class and Standard A mail, but the focus of ABP's participation in this docket will be the enormous increase proposed for Periodicals, which will compound significant increases for nearly all ABP members in the reclassification case, Docket No. MC95-1, and in R97-1. While the Postal Service claims that the average increase requested for outside of county Periodicals in this proceeding is 12.7%, our calculations and the calculations of others indicate that the vast majority of Regular Rate periodicals will suffer increases of about 14%-15.5%, which should be obvious from the percentage increases in the individual rate cells.¹ The attached charts prepared by an ABP member show mailing characteristics for four Periodicals with circulations of 13,275, 30,816,

¹ It appears that the only Regular Rate Periodicals experiencing increases under the proposed rates anywhere near the claimed average are those that are not barcoded.

86,034 and 105,594 that are typical of the business press in terms of size and billing determinants. The increases shown there are 14.77%, 14.41%, 14.70%, 14.83% respectively.²

I.

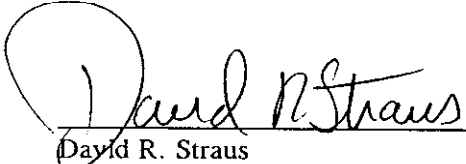
ABP requests that the following name included on the service list in this docket:

David R. Straus
Thompson Coburn LLP
700 14th Street, NW
Suite 900
Washington, D.C. 20005-2010
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II.

ABP requests a hearing on this matter and intends to participate in this proceeding.

Respectfully submitted,



David R. Straus

Attorney for American Business Press

Law Offices of:

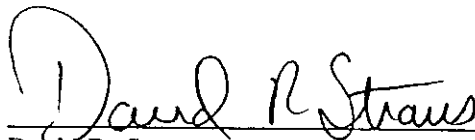
Thompson Coburn LLP
700 14th Street, N.W.
Washington, D.C. 20005-2010
202-508-1000

January 19, 2000

² Another member calculated the increases for 11 publications. One showed an increase of 12.9%, but the other 10 ranged from 14.3% to 15.5%, averaging just over 15%.

CERTIFICATE OF SERVICE

I hereby certify that I have this 19th day of January, 2000 served the foregoing document upon all of the participants in accordance with Section 12 of the Rules of Practice.


David R. Straus

Law Offices of:

Thompson Coburn LLP
700 14th Street, N.W.
Washington, D.C. 20005-2010
202-508-1000

Regular Rate Periodicals

Current vs. Proposed

Parameters Used for Postage Comparison

Publication	Fleet Owner
Location	St. Cloud, MN
Total Domestic Copies	105,594
Weight Per Copy	0.414800
Advertising %	58.90%
Nonadvertising %	41.10%
Presort Levels	
Basic Nonbarcoded	8.00%
Basic Barcoded	10.57%
3 Digit Nonbarcoded	0.10%
3 Digit Barcoded	64.78%
5 Digit Nonbarcoded	0.00%
5 Digit Barcoded	15.77%
Carrier Route	0.77%

Domestic Postage Comparison

Current Postage	\$31,508.76
Proposed Postage	\$36,181.41
Increase/Decrease	\$4,672.65
Percent Change	14.83%

Breakdown

	Current	Proposed	Change
Pound Rates			
Zone Rate	\$8,355.37	\$9,546.79	14.26%
Nonadvertising	\$2,898.32	\$3,348.36	15.53%
Piece Rates			
Presort	\$22,815.62	\$26,150.60	14.62%
Nonadv. Discount	\$2,560.55	\$2,864.34	11.86%
SCF Discount	\$0.00	\$0.00	0.00%

Regular Rate Periodicals

Current vs. Proposed

Parameters Used for Postage Comparison

Publication	American Printer
Location	Long Prairie, MN
Total Domestic Copies	86,034
Weight Per Copy	0.495500
Advertising %	53.70%
Nonadvertising %	46.30%
Presort Levels	
Basic Nonbarcoded	7.33%
Basic Barcoded	4.84%
3 Digit Nonbarcoded	3.28%
3 Digit Barcoded	46.31%
5 Digit Nonbarcoded	0.09%
5 Digit Barcoded	32.83%
Carrier Route	5.32%

Domestic Postage Comparison

Current Postage	\$25,851.08
Proposed Postage	\$29,650.70
Increase/Decrease	\$3,799.62
Percent Change	14.70%

Breakdown

	Current	Proposed	Change
Pound Rates			
Zone Rate	\$7,578.90	\$8,657.78	14.24%
Nonadvertising	\$3,177.76	\$3,671.20	15.53%
Piece Rates			
Presort	\$17,445.70	\$19,952.60	14.37%
Nonadv. Discount	\$2,350.19	\$2,629.03	11.86%
SCF Discount	\$1.09	\$1.86	71.43%

Regular Rate Periodicals

Current vs. Proposed

Parameters Used for Postage Comparison

Publication	Club Industry
Location	Shepherdsville, KY
Total Domestic Copies	30,816
Weight Per Copy	0.549300
Advertising %	36.90%
Nonadvertising %	63.10%
Presort Levels	
Basic Nonbarcoded	10.54%
Basic Barcoded	2.06%
3 Digit Nonbarcoded	6.89%
3 Digit Barcoded	47.64%
5 Digit Nonbarcoded	4.33%
5 Digit Barcoded	25.66%
Carrier Route	2.88%

Domestic Postage Comparison

Current Postage	\$8,956.77
Proposed Postage	\$10,247.02
Increase/Decrease	\$1,290.25
Percent Change	14.41%

Breakdown

	Current	Proposed	Change
Pound Rates			
Zone Rate	\$1,894.26	\$2,167.07	14.40%
Nonadvertising	\$1,719.65	\$1,986.68	15.53%
Piece Rates			
Presort	\$6,490.66	\$7,377.58	13.66%
Nonadv. Discount	\$1,147.25	\$1,283.36	11.86%
SCF Discount	\$0.55	\$0.95	71.43%

Regular Rate Periodicals

Current vs. Proposed

Parameters Used for Postage Comparison

Publication	Engineering & Mining Journal
Location	Long Prairie, MN
Total Domestic Copies	13,275
Weight Per Copy	0.297700
Advertising %	52.90%
Nonadvertising %	47.10%
Presort Levels	
Basic Nonbarcoded	6.67%
Basic Barcoded	15.93%
3 Digit Nonbarcoded	2.93%
3 Digit Barcoded	43.95%
5 Digit Nonbarcoded	1.05%
5 Digit Barcoded	18.01%
Carrier Route	11.44%

Domestic Postage Comparison

Current Postage	\$3,390.21
Proposed Postage	\$3,890.78
Increase/Decrease	\$500.57
Percent Change	14.77%

Breakdown

	Current	Proposed	Change
Pound Rates			
Zone Rate	\$712.78	\$813.74	14.16%
Nonadvertising	\$299.68	\$346.22	15.53%
Piece Rates			
Presort	\$2,746.70	\$3,143.58	14.45%
Nonadv. Discount	\$368.90	\$412.67	11.86%
SCF Discount	\$0.05	\$0.08	71.43%